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VIA ELECTRONIC FILING

Jocelyn G. Boyd

Chief Clerk/Administrator

Public Service Commission of South Carolina

Post Office Drawer 11649

Columbia, SC 29211

**Re: Exploration of a South Carolina Competitive Procurement Program for the Competitive Procurement of Energy and Capacity from Solar and Other Renewable Energy Facilities by an Electrical Utility as Allowed by South Carolina Code Section 58-41-20(E)(2)
Docket No. 2019-365-E**

Dear Ms. Boyd:

I am writing on behalf of Dominion Energy South Carolina, Inc. ("DESC"), in response to the letter (the "CCEBA Letter") filed in this docket by the Carolinas Clean Energy Business Association ("CCEBA") on July 16, 2021. Specifically, DESC writes to clarify that—although it remains willing to work with interested parties in this docket—neither it nor its counsel in this proceeding received any prior notice of CCEBA's recommendation therein that DESC, CCEBA, and "any other stakeholders" confer on the procedural schedule in this docket within 30 days after DESC's Integrated Resource Plan (the "IRP") is approved.

As directed by the Public Service Commission of South Carolina (the "Commission"), DESC filed its proposed procedural schedule for this docket on May 19, 2021. Although no consensus approach was reached by the parties in this docket, DESC worked in good faith with all parties in hopes of providing one approach for Commission approval. Since the joint letter filed in this docket on March 22, 2021, the parties had discussions regarding a preferred procedural schedule.¹ Throughout these discussions, DESC remained consistent in its position

¹ The parties in this docket provided updates on these discussions to the Commission on April 5th and April 19th, ultimately agreeing to continue discussions until May 19th. The parties agreed to submit separate procedural schedules to the extent a consensus could not be reached by May 19th. Given that no consensus was reached, DESC filed its proposed procedural schedule on the agreed-upon deadline.

that the content and scope of any procedural schedule must necessarily be within the scope of Order No. 2020-779, which was issued in this generic docket on November 18, 2020.

In that order, the Commission clearly stated the purpose of this docket was to “explore” various aspects of programs for the competitive procurement of renewable energy (“CPRE”) by reviewing topics such as best practices and types of CPREs, rather than actually establishing any such program. With that in mind, DESC respectfully requested in its May 19th letter that the Commission issue the following order:

1. Where a utility’s IRP identifies a need for renewable resources in the future, then that utility shall explore options to fulfill that need. Such options may include, but are not limited to, utility ownership, utility-specific procurement mechanisms such as CPRE, and deployment of emerging technologies.
2. Where a utility identifies a utility-specific CPRE as an effective mechanism to address a renewable need identified in the IRP, it will request that the Commission open a utility-specific docket within 90 days of such request.
3. Once the utility-specific docket is established, such utility will work to establish a broad stakeholder process to develop CPRE guidelines and protocols.
4. Issues to be addressed during that stakeholder process may include but are not limited to (1) proposed procedural steps for the utility-specific procurement docket; (2) utility participation and procurement administration; and (3) financial (e.g., least-cost) and non-financial terms and conditions that shall be included in such guidelines and protocols. This process would be conducted with the ultimate goal of presenting a unanimous proposal to the Commission for how such CPRE should be structured to fulfill the identified need of that utility in the best interest of its ratepayers.

The above recommendations were filed by DESC because the parties were unable to reach consensus within the agreed-upon time period. CCEBA failed to make any such recommendations at that time and then—without even a courtesy call to DESC—submitted its filing. Given that DESC only learned of CCEBA’s proposal after the CCEBA Letter was filed, DESC writes to clarify that the CCEBA Letter does not represent a consensus approach between DESC and CCEBA, and does not signal a retreat from the prior May 19th date to file a proposed schedule or a shift from DESC’s preferred proposal outlined above.

In the future—particularly in matters such as this where the parties have been working extensively to find a common result within the limitations set by the notice and scope of the proceeding—DESC would appreciate the opportunity to engage any such party prior to such a filing.

Sincerely,



J. Ashley Cooper

JAC:lcc

cc: All parties of record in Docket No. 2019-365-E (Via Electronic Mail)